

Dorset CAN response to proposed Portland Waste Incinerator

As submitted 15 April 2021

Dorset Climate Action Network (Dorset CAN) was established as a county-wide network across Dorset Council area and BCP in October 2020. It is in the process of seeking legal status. Meanwhile, it has over 500 members, including the leaders of many civil society groups and a number of town and parish councils.

Aim of the Network. Dorset CAN was set up in response to the rapidly growing public concern about the impact of climate change, the use and abuse of the world's resources, the loss of wildlife and the related threats to social and inter-generational justice at global, national and local level. The Network aims to stimulate awareness of these issues and to support action by people and local organisations throughout the wider Dorset, as a complement to action by national government, Dorset and BCP Councils & other agencies.

Responses to Dorset Council policy documents. On 20 January 2021, Dorset CAN submitted a strong collective response to the Council's Climate and Ecological Emergency Strategy and Action Plan. On 15 March, we submitted a strong and detailed response to the Council's draft Local Plan. We have drawn on those two responses in shaping our objection to the proposed Portland Waste Incinerator.

Portland Waste Incinerator. We express our strong objection to the proposed waste incinerator on Portland.

In our response to Dorset Council's draft Climate and Ecological Emergency Strategy, we noted that :

"Dorset Council is rightly proud of its record as one of the top three local waste authorities in England, in terms of the proportion of waste collected by the Council that is now being recycled. But there is still significant potential for further recycling and (more importantly) for reduction or re-use of waste. We suggest that the Council should adopt a **Clean Dorset** programme, aiming to radically reduce its levels of air pollution to well below statutory limits, eliminate all single-use plastic and achieve the highest levels of waste reduction, re-use and recycling in the country. All waste management should adhere to the Proximity Principle by eliminating unnecessary waste-miles within Dorset and preventing the importing of waste from outside Dorset by road or sea."

In that context, we stated that :

"We are strongly opposed in principle to incineration of waste. It should not be seen as a source of renewable or low-carbon energy, because a large part of the waste that is typically incinerated is plastic, which is a fossil fuel derivative. Waste incinerators emit large volumes of carbon dioxide and of air-polluting particulates. Since they may have an operating life of 25 or more years, they create a long-lasting demand for waste over a period which should instead see a policy-driven reduction in the volumes of waste and a determined increase in recycling rather than burning."

For the above reason, we object to the proposed Portland Waste Incinerator. We urge Dorset Council – both as waste authority and as planning authority – to turn its face against this project, which we believe to be wholly incompatible with the reductions in greenhouse gas emissions and in air pollution which the Council has embraced in its Climate and Ecological Emergency Strategy.

Grounds for objection. Our grounds for objection to the proposal are as follows :

Conflict with Climate Action targets. The proposed Incinerator would be in conflict with the clear aims – adopted by the Government and Dorset Council – to sharply reduce greenhouse gas (GHG) emissions over the next twenty years. This conflict would be

expressed in two main ways – substantial emission of greenhouse gases by the Incinerator for its whole life-cycle; and disincentive to finding clean ways to reduce and recycle waste.

Emissions. The Incinerator, once in operation, would become a major and permanent source of emissions of CO₂, other GHGs and particulates. For each ton of waste burnt, 1 ton of CO₂ would be emitted and ¼ ton of toxic ash created. The proposer estimates emission of 577 tonnes of CO₂ a day, which would ‘blow a hole’ in Dorset Council’s commitment to eliminate carbon emissions.

Disincentive to a sustainable approach to waste. The Incinerator would impede, for the 25 or more years of its expected life, the search for more acceptable solutions to the reuse, recycling or disposal of waste. The trend of government policy is towards reduction and recycling of waste, and away from continuation of waste volumes and damaging methods of waste disposal such as incineration and landfill. In its report of June 2020, ‘Reducing UK emissions: Progress Report to Parliament’, the Committee on Climate Change advised that :

“Achieving significant emission reductions in the waste sector requires a step change towards a circular economy, moving away from landfill and incineration (and the associated methane and fossil CO₂ emissions), and towards a reduction in waste arisings and collection of separated valuable resources for re-use and recycling. This applies at local, regional and national levels... Achieving a 70% recycling rate at the latest by 2030 in England (with this target to be included in the Environment Bill) will be key to phasing out waste exports and limiting fossil emissions from energy from waste plants.”

Pollution. In addition to greenhouse gases, incinerators emit particulates so small that they can lodge in human lungs and even pass into the bloodstream, thus contributing to the air pollution which is estimated to be the cause of 7.8 million deaths in the UK each year. The Portland Incinerator would be a significant source of air and water pollution, with negative effects on local residents’ health and the sensitive marine environment. Particulates would land on Portland and be blown by prevailing winds over the dense populations of Weymouth, Dorchester and beyond

Impact on the natural environment. Portland itself is host to a range of rare flora and fauna, which are susceptible to damage by air pollution. The seas around Weymouth and Portland contain 4 Marine Conservation Zones. Shellfish and fishing industries, together with humans bathing and engaging in water-sports, would be at potential risk from residual contaminants in water discharged from the plant into the sea. Natural England has noted that :

“The air quality impacts of the development as a whole are likely to degrade the habitats and species within the zone of influence”.

Dorset Wildlife Trust has- noted :

“Portland Harbour... is a Sensitive Marine Area and thus a habitat of national significance; it is unique in England for its deep sheltered mud habitats supporting sea pens”.

Transport impacts. The transport of waste from within Dorset – estimated at 80 articulated lorry journeys each day of the week – would cause significant additional heavy traffic, and associated greenhouse gas emissions, across the county, through Weymouth and onto Portland. Much of the waste would be brought from regions outside Dorset or even abroad, thus generating extensive waste-miles, much use of fossil fuel and further carbon emissions, in full violation of the proximity principle.

Impact on landscape. The massive building and tall chimney would disfigure the coastal landscape and visually diminish the remarkable profile of the famous Isle of Portland. It would be a despoiling feature in views from miles around, including the impressive views of the Isle as approached along the A354 causeway, distant views from Dorset’s Area of Outstanding Natural Beauty and views from the sea. This would fundamentally harm the

setting of the Jurassic Coast World Heritage Site and the landscape character of the whole region, and would discourage tourism on Portland itself.